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 15          *Attorneys for Plaintiffs*

## UNITED STATES DISTRICT COURT

### DISTRICT OF NEVADA

11          MARIAH MAAS, as Special Administrator  
 12          for the Estate of Tiffany Slatsky, MARTIN  
 13          SLATSKY, as parent and legal guardian of  
 14          CADE SLATSKY, a minor.  
 15          Plaintiffs.

16          vs.

17          CHRISTOPHER CANDITO, an individual,  
 18          ANDREW CLAPPER, an individual,  
 19          NICHOLAS ROBISON, an individual,  
 20          ANDREW STOCKER, an individual,  
 21          STEVEN HONSOWETZ, an individual,  
 22          CITY OF NORTH LAS VEGAS, a  
 23          municipality; NORTH LAS VEGAS FIRE  
 24          DEPARTMENT, a City of North Las Vegas  
 25          agency; GNLV, LLC dba GOLDEN  
 26          NUGGET HOTEL & CASINO, a Domestic  
 27          Limited-Liability Company; DOMAIN  
 28          PROPERTY OWNER LLC; a Foreign  
 29          Limited-Liability Company; OAKTREE  
 30          CAPITAL MANAGEMENT L.P.; a  
 31          Foreign Limited Partnership; DOE  
 32          DEFENDANTS I through XX, and ROE  
 33          CORPORATIONS I through X, inclusive,  
 34          Defendants.

CASE NO. 2:22-cv-568-DJA

### **STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING PURSUANT TO FRCP 6(B)(1)(A) AND LR IA**

**6-1**

25          Plaintiffs Mariah Maas, Martin Slatsky, and Cade Slatsky, ("Plaintiffs") by and through  
 26          their attorneys of record, Andre M. Lagomarsino, Esq of Lagomarsino Law, Lloyd W. Baker, Esq.,  
 27          Andrew Barton, Esq., Alyssa Piraino, Esq. of Baker Law Offices, and Defendants City of North  
 28          Las Vegas ("CNLV") and North Las Vegas Fire Department ("NLVFD") by and through their

1 attorneys of record, Robert W. Freeman, Esq. and E. Matthew Freeman, Esq. of Lewis Brisbois  
2 Bisgaard & Smith hereby stipulate to an extension of time to file a responsive pleading to  
3 Defendants CNLV and NLVFD Motion to Dismiss (ECF #21). This is the parties first request to  
4 extend the responsive pleading deadline.

5 Plaintiffs filed their complaint and demand for jury trial in the Clark County Nevada  
6 District Court on February 7, 2022.

7 Defendant Nicholas Robison then filed his petition for removal from District Court Clark  
8 County Nevada (ECF #1) on April 4, 2022.

9 Defendants CNLV and NLVFD filed their Notice of Consent to the removal (ECF #16) on  
10 May 15, 2022 and subsequently filed a Motion to Dismiss (ECF #21) on May 20, 2022.

11 Plaintiffs filed a Notice of Appearance (ECF #22) noticing the appearance of Andre M.  
12 Lagomarsino, Esq. of Lagomarsino Law on their behalf on May 23, 2022.

13 Currently, the deadline for a responsive filing to ECF #21 is June 3, 2022. The parties have  
14 agreed to extend this deadline by 14 days as 1) Plaintiffs' counsel Andre M. Lagomarsino's office  
15 is currently under construction, and 2) Plaintiffs' counsel Andre M. Lagomarsino, Esq. is called  
16 out of town for multiple business days.

17 The parties have met and conferred and agree that neither side will suffer prejudice from  
18 this Stipulation for Extension of Time.

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1 Therefore, Plaintiffs and Defendants CNLV and NLVFD respectfully request that  
2 Plaintiffs' deadline to respond to the Motion to Dismiss (ECF #21) be extended from June 3, 2022  
3 to on or before June 17, 2022

4 **IT IS SO STIPULATED**

5 DATED this 1<sup>st</sup> day of June, 2022.

6 **LAGOMARSINO LAW**

7 By: /s/ Andre M. Lagomarsino  
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19 **LEWIS BRISBOIS BISGAARD & SMITH**

20 By: /s/ Robert W. Freeman, Jr.  
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25 *Attorneys for Defendants City of North Las Vegas  
and North Las Vegas Fire Department*

26 **IT IS SO ORDERED.**

27 By: \_\_\_\_\_  
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29   
30 DANIEL J. ALBREGTS  
31 UNITED STATES MAGISTRATE JUDGE

32 DATED: June 7, 2022  
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